

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Local Number Portability Porting Interval and)	WC Docket Nos.: 07-244
Validation Requirements)	

COMMENTS OF THE MINNESOTA INDEPENDENT COALITION

The Federal Communications Commission ("Commission") has invited comments on its tentative conclusion that the time interval for simple port requests should be reduced from the currently applicable period of four (4) business days, to forty-eight (48) hours.¹ The Minnesota Independent Coalition ("MIC"), as a coalition of incumbent rural telephone companies, urges the Commission not to adopt a forty-eight (48) hour interval requirement because small carriers frequently do not have the resources to meet such a short service interval.

The MIC requests that the Commission adopt an interval which reasonably balances the technical and business limitations under which small companies operate, against the benefits to consumers of a rapidly executed porting request. The MIC supports a requirement that a rural telephone company² ("Rural Company") complete simple port requests, either wireline-to-wireline or intermodal, within the shorter interval of (a) two (2) business days; or (b) the service interval which the Rural Company has established to provision new local service to its own customers when no field dispatch is required.

The operational and administrative capabilities of large- to mid-size carriers differ from those of Rural Companies. Rural Companies typically do not have automated linkage systems

¹ *Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking*, WC Docket Nos. 07-243, 07-244, 04-36, CC Docket No. 95-116, FCC 08-188 (released November 8, 2007, published February 21, 2008).

² 47 U.S.C. § 153(37).

between their ordering, provisioning, and billing systems. They do not staff business offices to process customer orders or staff central office facilities outside typical business hours, except to dispatch technicians to respond to reported network outages or other emergencies.

MIC member companies that have received specific requests for number portability and are capable of number porting³ typically receive port requests through email or facsimile transmittal. Once received, a request for a simple port is handled by the company through a manual process requiring the following steps:

- 1) Business office personnel log the order, and validate the customer account and telephone number.
- 2) Business office personnel issue a confirmation to the porting carrier that the port will be performed.
- 3) Business office personnel issue a work order to company network operations to enter the port translations into the central office switch.
- 4) Business office personnel issue an order to the E911 database provider "unlocking" the record so it may be assumed by the new service provider.
- 5) Business office personnel issue an order to the company's Service Order Administration ("SOA") provider, identifying that a port order has been received and concurring in that port order.
- 6) Network operations personnel receive the work order from the company business office to establish translations for an "unconditional 10-digit trigger," which effectively makes the number ready whenever the signal is received mechanically from the Number Portability Administration Center (NPAC).

For a small carrier, each step in this process requires manual action to complete the port in its central office switch, billing system, 911 system and SOA system. A typical rural

³ See 47 C.F.R. § 52.23(c).

company has few business office or plant employees⁴, and very few of these are likely to be trained to complete port requests. Business office and network operations personnel are not available except during business hours and are invariably responsible for performing multiple tasks within the company. It would be unreasonable to require rural companies to expand operations beyond normal business hours in order to perform ports.

The Commission should adopt a porting interval that does not overburden Rural Companies' operations by requiring compliance with deadlines that they do not meet in their own service provisioning. The harm to consumers and to competition in telecommunications services is minimal if Rural Companies are permitted a reasonable period of time which is longer than that afforded national or regional carriers in order to complete simple port requests. A requirement that Rural Companies complete simple port requests within the shorter interval of (a) two (2) business days; or (b) the service interval which the Rural Company has established to provision new local service to its own customers when no field dispatch is required, fairly balances the competing concerns.

Date: March 24, 2008

Respectfully submitted,

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and

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Coalition

⁴ See Telergy Alliance, 2007 Telergy Benchmarking Study 53 (2007) (average of 4 commercial - customer service employees and 8 plant employees for 190 rural telephone companies surveyed).